

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

HARTFORD INVESTMENT FINANCIAL
SERVICES, LLC,

Defendant.

Civil No. 1:11-cv-01083-RMB-KMW

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

HARTFORD FUNDS MANAGEMENT
COMPANY, LLC,

Defendant.

Civil No. 1:14-cv-01611-RMB-KMW

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

HARTFORD FUNDS MANAGEMENT
COMPANY, LLC,

Defendant.

Civil No. 1:15-cv-01876-RMB-KMW

**JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINES
RELATED TO DEFENDANTS' MOTION TO (1) STRIKE PLAINTIFFS' DEMANDS
FOR A JURY TRIAL AND (2) PRECLUDE PLAINTIFFS FROM OFFERING
EVIDENCE AT TRIAL OF "LOST INVESTMENT EARNINGS"**

WHEREAS, on May 4, 2016, Defendants filed a Motion to (1) Strike Plaintiffs' Demands for a Jury Trial; and (2) Preclude Plaintiffs From Offering Evidence at Trial of "Lost Investment Earnings" (the "Motion");

WHEREAS, Defendants noticed the Motion for the June 6, 2016 motion day;

WHEREAS, Plaintiffs' Opposition is currently due on May 23, 2016, and Defendants' Reply is due on May 30, 2016;

WHEREAS, the parties have agreed, subject to approval of the Court, to extend the deadline for Plaintiffs' Opposition and Defendants' Reply to allow adequate time for both parties to brief the issues raised in the Motion; and

WHEREAS, there have been no prior extensions of the briefing schedule for the Motion;

NOW, THEREFORE, the parties hereby STIPULATE AND AGREE, by and through their undersigned counsel and subject to the Court's approval, as follows:

1. Plaintiffs shall have until June 6, 2016 to file their Opposition to Defendants' Motion.
2. Defendants shall have until June 24, 2016 to file their Reply.
3. The motion day for the Motion will be July 5, 2016.

Dated: May 13, 2016

By: /s/ Robert L. Lakind
Robert L. Lakind
Arnold C. Lakind
SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.
101 Grovers Mill Road, Suite 200
Lawrenceville, NJ 08648
Tel: (609) 275-0400
Fax: (609) 275-4511

Robin F. Zwerling
Jeffrey C. Zwerling
Susan Salvetti
Andrew W. Robertson
ZWERLING, SCHACHTER
& ZWERLING, LLP
41 Madison Ave, 32nd Floor
New York, NY 10010
Tel: (212) 223-3900
Fax: (212) 371-5969

Attorneys for Plaintiffs

SO ORDERED.

_____, 2016

Respectfully submitted,

By: /s/ Anthony J. Sylvester
Anthony J. Sylvester
SHERMAN WELLS SYLVESTER
& STAMELMAN LLP
210 Park Avenue, 2nd Floor
Florham Park, NJ 07932
Tel: (973) 302-9700
Fax: (973) 845-2546

Sean M. Murphy
Robert C. Hora
MILBANK, TWEED,
HADLEY & McCLOY, LLP
28 Liberty Street
New York, NY 10005
Tel: (212) 530-5170
Fax: (212) 822-5170

Attorneys for Defendants

Hon. Karen M. Williams
United States Magistrate Judge